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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

In Re: §  
Terence Andrew Ryan § Case No. 09-70523-HDH-13  
§ Chapter 13  
Debtor §

DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtor, by counsel, and for this Motion state as follows:

1. Debtor filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 08-70072-HDH-13 filed on 2/29/2009.
3. Debtor seeks an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor's prior case was dismissed for: Debtor lost his job and was unable to find employment in order to get current before his case was dismissed.
5. The following change of circumstances demonstrate that the Debtor can perform this plan and are likely to complete the case successfully: Debtor is currently employed at Walmart and the Trustee payment will be deducted from his pay check.

WHEREFORE, Debtor requests this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,  
/s/Monte J. White  
Attorney for Debtor

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on October 8, 2009 on all parties on the mailing matrix:

/s/Monte J. White  
Attorney for Debtor

Capital One Bank Washington Mutual/Providian  
c/o TSYS Debt Mgmt P.O. Box 9180  
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Norcross, GA 30091

CBC/Financial Credit/San Diego  
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Visalia, CA 93291

Citibank USA  
P.O. Box 6003  
Hagerstown, MD 21747

Citifinancial  
P.O. Box 499  
Hanover, MD 21076

Franchise Tax Board  
Special Procedures  
PO Box 2952  
Sacramento, CA 95812-2952

IRS Special Procedures  
1100 Commerce St., Room 951  
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Jefferson County Dept. of Human  
Child Support Enforcement Progr.  
3500 Illinois St. Suite 1300  
Golden, CO 80401-6010

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